

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSE LUIS BECERRA-YEPEZ,

Defendant.

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Criminal Complaint No. 06- **37M-3-MPT**

MOTION FOR DETENTION HEARING

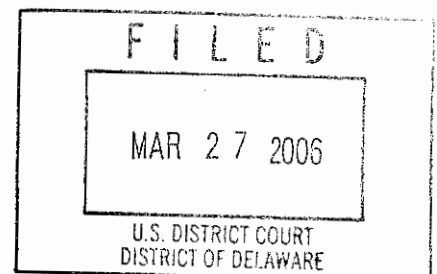
NOW COMES the United States and moves for the pretrial detention of the defendant, JOSE LUIS BECERRA-YEPEZ, pursuant to 18 U.S.C. § 3142(e) and (f). In support of the motion, the United States alleges the following:

1. **Eligibility of Case.** This case is eligible for a detention order because the case involves (**check all that apply**):

- ☐ Crime of violence (18 U.S.C. § 3156)
- ☐ Maximum sentence life imprisonment or death
- ☒ 10+ year drug offense
- ☐ Felony, with two prior convictions in above categories
- ☒ Serious risk defendant will flee
- ☐ Serious risk obstruction of justice

2. **Reason For Detention.** The court should detain defendant because there are no conditions of release which will reasonably assure (**check one or both**):

- ☒ Defendant's appearance as required
- ☒ Safety of any other person and the community



3. **Rebuttable Presumption.** The United States **will** invoke the rebuttable presumption against defendant under § 3142(e). (If yes) The presumption applies because **(check one or both):**

 X Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c)

 Previous conviction for "eligible" offense committed while on pretrial bond

4. **Time For Detention Hearing.** The United States requests the court conduct the detention hearing,

 At first appearance

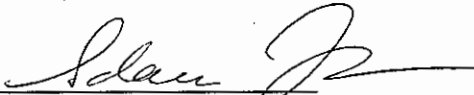
 X After continuance of 3 days (not more than 3).

Respectfully submitted,

COLM F. CONNOLLY
United States Attorney

Date: March 27, 2006

BY:


Adam Safwat
Assistant United States Attorney